**THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In Re Patent Application of
Marcia Rojewski

Group Art Unit: 3626

Serial No. 09/676,391

Atty. Dkt: HARTFORD-3

Filing Date: 09/29/2000

Examiner: Frenel, Vanel

For: **AN IMPROVED METHOD AND SYSTEM FOR IDENTIFYING
SUBROGATION POTENTIAL AND VALUING A SUBROGATION FILE**

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

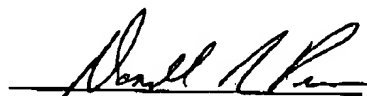
DECLARATION OF DONALD R. PIERCE

Dear Sir(s):

I, Donald R. Pierce, being of legal age, do hereby declare that:

1. I received my Bachelors degree in Accounting from University of Connecticut. I am currently working as a Product Manager for Trumbull Services – A division of Hartford. I have 18 years of experience relating to developing insurance company related computer systems and methods.
2. I have read and understand United States Patent Application Serial No. 09/676,391, including the claims thereof. This patent application teaches a method and system for identifying subrogation potential and valuing a subrogation file, in addition to a computerized method for identifying select ones of insurance records that possess a favorable subrogation potential.
3. Upon information and belief, The Hartford Fire Insurance Company has expended in excess of \$6,000,000, over the course of 13 years in developing a system according to United States Patent Application Serial No. 09/676,391.

4. I have read and understand a printout of an electronic copy of the article entitled "Technology: Unlocking the Neural Network", that purports to be authored by John Mutch, and appear in Risk and Insurance, in Jan. 1999.
5. I have read and understand a printout of an electronic copy of the article entitled "High Tech Sleuths" that purports to be authored by Leslie Hann, and appear in Best's Review, in Nov. 1998.
6. In my opinion, these articles fail, in any combination, to present any meaningful guidance what-so-ever with regard to how to make and use a system and method according to the teachings of United States Patent Application Serial No. 09/676,391.
7. In my opinion, these articles fail, in any combination, to give possession of any of the inventions claimed in United States Patent Application Serial No. 09/676,391.
8. All statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.



Donald R. Pierce

Dated October 19, 2005.